

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**IN RE EQUIFAX INC.
SECURITIES LITIGATION**

Consolidated Case No.
1:17-cv-03463-TWT

**SUPPLEMENTAL DECLARATION OF LUIGGY SEGURA
REGARDING: (A) MAILING OF THE NOTICE AND CLAIM FORM
AND (B) REPORT ON REQUESTS FOR EXCLUSION RECEIVED**

I, Luiggy Segura, declare as follows:

1. I am the Director of Securities Class Actions at JND Legal Administration (“JND”). Pursuant to the Court’s February 25, 2020 Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement (ECF No. 163) (the “Preliminary Approval Order”), JND was authorized to act as the Claims Administrator in connection with the Settlement of the above-captioned action (the “Action”).¹ I submit this Declaration as a supplement to my earlier declaration, the Declaration of Luiggy Segura Regarding: (A) Mailing of the

¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement dated February 12, 2020 (ECF No. 159-2).

Notice and Claim Form; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion Received to Date, dated May 21, 2020 (ECF No. 176-2) (the “Initial Mailing Declaration”). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

CONTINUED MAILING OF THE NOTICE PACKET

2. Since the execution of my Initial Mailing Declaration, JND has continued to disseminate copies of the Notice and Claim Form (together, the “Notice Packet”) in response to additional requests from potential Settlement Class Members and nominees. Through June 18, 2020, JND has mailed a total of 185,617 Notice Packets to potential Settlement Class Members and nominees.

TELEPHONE HELPLINE AND WEBSITE

3. JND continues to maintain the toll-free telephone number (1-844-975-1781) and interactive voice response system to accommodate any inquiries from potential members of the Settlement Class. JND also continues to maintain the dedicated website for the Action (www.EquifaxSecuritiesLitigation.com) in order to assist Settlement Class Members. JND posted to the website copies of the papers filed in support of Lead Plaintiff’s motion for final approval of the Settlement and Plan of Allocation and Lead Counsel’s motion for an award of attorneys’ fees and expenses. JND also updated the website to inform Settlement Class Members that

the June 26, 2020 Settlement Fairness Hearing would be conducted by videoconference and to provide the Zoom videoconference meeting link and alternative call-in number to participate in the hearing. JND will continue maintaining and, as appropriate, updating the website and toll-free telephone number until the conclusion of the administration.

REPORT ON REQUESTS FOR EXCLUSION RECEIVED

4. The Notice informed potential members of the Settlement Class that requests for exclusion from the Settlement Class were to be mailed or otherwise delivered to the Claims Administrator, addressed to Equifax Securities Litigation, EXCLUSIONS, c/o JND Legal Administration, P.O. Box 91319, Seattle, WA 98111, such that they were received no later than June 5, 2020. The Notice also sets forth the information regarding transactions in publicly-traded Equifax common stock that must be included in each request for exclusion. As of the date of this declaration, JND has received five (5) requests for exclusion from the Settlement Class. Exhibit 1 hereto lists the names of the persons and entities who have requested exclusion from the Settlement Class and their city and state. Copies of the requests for exclusion received are attached as Exhibits 2-6. In the interest of privacy and security, the requests for exclusion have been redacted to remove the street

addresses, telephone numbers, and financial account numbers of the persons and entities requesting exclusion.

5. At the direction of Lead Counsel, JND mailed letters to Edward C. Schmidt, MD and Jean Nash Hunter indicating that their request for exclusion was deficient because it did not provide all the required information regarding their transactions in Equifax common stock. As of the date of this Declaration, neither has responded or otherwise made any effort to cure such deficiencies.

I declare, under penalty of perjury under the laws of the United States, that the foregoing is true and correct.

Executed on June 19, 2020.



LUIGGY SEGURA